From:

WordPress <WEB@ed.gov>

Sent:

Monday, January 12, 2015 2:18 PM

To:

College Feedback

Subject:

User Comment on New System of College Ratings

User Comment: When rating community college, your system must be nuanced concerning completion rates. A significant portion of the student body at community colleges have no intention of transferring to a four-year school, but may simply take courses for personal growth, or never intend to earn an A.A. degree: completion for those students means finishing the course work. The community college serves the community in more ways than simply granting degrees and the rating system should reflect that complexity. In some cases transfer students do not finish an A.A. degree at the community college before they transfer to the four-year institution for various reasons. Again, the rating system must clearly distinguish or track the students who move to the Bachelors institute without earning an A.A.; those students complete the coursework they need–prerequisites or general education–in order to advance. If the metric simply measures completion! of a degree, then the community college early transfer student will not be counted as a "completion" of intended goals.

So, the rating system for the community college must be much more complex and nuanced considering that the goals and intention of the students is also much more complex and nuanced.

Constituency: University Staff/Faculty

Other Constituency (if supplied):

User E-mail (if supplied):

This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

From:

Daniel Flowers < dflowers@saintmarys.edu>

Sent:

Monday, January 12, 2015 4:46 PM

To:

College Feedback

Cc:

Carol Ann Mooney, Vicki Briggs

Subject:

Draft College Ratings Feedback

Attachments:

SMCFeedbackDOERatings.pdf

Good Afternoon,

Please find attached the official feedback from Saint Mary's College, Notre Dame, IN to the Department's draft proposal on college ratings issued in December 2014.

Thank you for welcoming feedback.

Daniel

Daniel R. Flowers Director of Institutional Research Saint Mary's College 165 Le Mans Hall Notre Dame, IN 46556 (574) 284-4574



January 12, 2015

Under Secretary of Education, Dr. Ted Mitchell U.S. Department of Education 400 Maryland Avenue, SW Washington, D.C. 20202

Dear Dr. Mitchell:

Saint Mary's College, Notre Dame, IN would like to thank the Department of Education for their draft proposal on the College Ratings released in December 2014. We are also appreciative of the opportunity to offer public comment. Saint Mary's College is a four-year, Catholic, residential, women's liberal arts college offering five bachelor's degrees and more than 30 major areas of study, such as business, nursing, art, chemistry, and social work. We have three main comments we would like to share.

- (1) The first relates to how institutions will be grouped for comparison. We do not believe it is sufficient to only divide two-year and four-year institutions but believe at a minimum, institutions should be further divided by status as public or private institutions. For example, it would not be realistic to compare net-price at a public institution for students paying in-state rates to those at private institutions. This comparison would not control for-public subsidies that allow for reduced in-state tuition and unfairly disadvantage private institutions in any comparison.
- (2) We would like to praise the Department of Education for their measure on earnings. We agree that this method of setting a minimum threshold for earnings and considering the percentage of graduates earning above the threshold controls for institutions with programs that do not traditionally have high starting salaries (i.e. social work, education, etc.). A simple median or average earnings of an institution's graduates would not adequately control for institutions with significant enrollments in such programs. We would also suggest consideration be given to controlling for graduates who voluntarily do not enter the workforce (perhaps to raise children or to engage in non-paid volunteer work). In fact, some of these graduates may even be working part-time, but we still do not believe it would be appropriate to consider their earnings in the same way as those who have pursued and secured full-time employment. We would hope that such graduates would not be considered as "below" the earnings threshold since these activities are frequently a conscious choice.

(3) We hope the Department of Education considers allowing institutions to provide contextual information and/or data to the DOE supplied metrics when released to the public. We would also advocate early access to the metrics prior to public disclosure in order to provide institutions adequate time for such context to be provided once the DOE metrics are released publicly.

Again, we thank the Department for their efforts and willingness to consider feedback.

(b)(6)		
Carol Ann Mooney President	Daniel R. Flowers Director of Institutional Research	

CAM:vb

_			
Fr	OI	n:	

WordPress <WEB@ed.gov>

Sent:

Wednesday, January 14, 2015 10:43 PM

To:

College Feedback

Subject:

User Comment on New System of College Ratings

User Comment: I have strong interest in the positive outcomes that can be achieved by the proposed college rating system.

I would like to participate in the review and public comment.

I have one daughter who completed a BS degree, another daughter is struggling to complete a Computers Science degree and a son who is in the NAVY and has enrolled in several classes I also have taught in the Community Colleges for 14 years and operated my own commercial training business for 20 years prior to that.

I have a strong opinion about how colleges fail students. Primarily by not insisting upon psychometric attitude and personality profiles to identify sets of aligning degrees from which students can choose their primary major plan of study. Current practices completely ignore the proven capability of psychometric evaluation and the result is a very hap-hazard exploration of likes and dislikes by taking a variety of classes and then switching majors.

This results in a zig-zag pattern that demoralizes students and pumps up their time to completion as well as the cost of tuition to achieve completion and for sure hightens the risk of dropping out.

Constituency: University Staff/Faculty

Other Constituency (if supplied):

User E-mail (if supplied): (b)(6)

This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

From:

WordPress <WEB@ed.gov>

Sent:

Wednesday, January 14, 2015 12:37 PM

To:

College Feedback

Subject:

User Comment on New System of College Ratings

User Comment: It really bothers me that young people are boxed into the idea that university must fit into a four year academic undergraduate career. For my children, university was a time of self discovery and learning that they used to shape who they are today. My children always said that the fact that college was expensive taught them the value of their liberal education. A very crucial part of their success at the university and in their professional lives and development beyond college was their active engagement in opportunities that went beyond college classes. They studied languages, studied abroad for one semester, engaged in music groups, cross-cultural organizations, and studied very hard with professors who cared deeply about their learning. I think a rating system must measure student engagement in learning opportunities campuses provide as well as the sense of purpose they see in learning about a broad set of areas of study (our world is co! mplex and we need people who can understand and solve problems in complex ways).

Thank you for reading my message!

Simone

Constituency: Parent

Other Constituency (if supplied):

User E-mail (if supplied):

This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

From:

Robinson, Linda < Linda. Robinson@montgomerycollege.edu>

Sent:

Thursday, January 15, 2015 10:13 AM

To:

College Feedback

Subject:

comments- College Ratings

Many of these measures are based on data reported on FAFSA form. At the community college level, there are significant number of middle income level students who do not complete a FAFSA and there are other students as well that do not. Won't that skew the results? I am a counselor at a community college so I am speaking from firsthand knowledge.

Also, I have concerns about the use of the word "consumer" in reference to education. What are we loosing as a society where everything is reframed as a relationship between "consumer" and market? This a broader problem in American culture; the loss of humanistic values and quantification of that which is unquantifiable. All these measures will not truly reflect the transformative experience that occurs in the classroom; nor will it truly reflect the value of education beyond the narrow lens that is being applied here- the goal of increasing the dollar value of the individual -how much is he or she contributing to labor and production and how much monetary compensation is that individual able to obtain throughout their lifetime. By creating these very metrics, as a government representing the people, we are in effect, proclaiming that education, like everything else in the USA, is also a commodity. A question to ponder- what kind of society do we continue to create? Are we really that surprised by the fall out in terms of our social problems- the alienation of individuals, the increasing levels of mental health problems, broken families, etc?

Professor/Counselor

From:

WordPress <WEB@ed.gov>

Sent:

Thursday, January 15, 2015 6:31 PM

To:

College Feedback

Subject:

User Comment on New System of College Ratings

User Comment: It would better (and less costly for the taxpayer) for the government to inform and educate its consumers (students and parents) as to what (the government) deems a quality education and let the consumer decide than to further burden higher education institutions with more federal compliance regulation that unnecessarily drives up the cost of education and has no meaningful impact. It's the same process consumers use when voting for their elected officials. We make even less informed decisions when we vote. Perhaps the government should seek input from the American taxpayer on what should constitute a ratings system for the effectiveness of it federal government. Elected officials would have a better idea of what colleges and university have to go through to comply with new rules of a higher education rating system. Elected official would be taken off task from governing while they devote time to measuring and reporting their effectiven! ess, just like educational institutions do. Like the Feds holding Title IV funds from colleges and universities in ransom for federal compliance, all taxpayers would get a reduced tax rate when the federal government falls below threshold on a government effectiveness ratings system (GERS). Honestly, the most unreliable systems for measurement are when humans measure the effectiveness of other humans. You're setting up a system where the real outcomes will be graduates sitting around talking about which institutions they graduated from while asking if you want fries with that burger. We already have plenty of college graduates who can't find decentpaying jobs because our elected officials are devoting their time and energy to finding out what kind of school they graduated from rather that creating the kind of jobs that graduates from all colleges and universities would be happy to work (to help pay off their student loans.) The complexity of this is beyond the ca! pacity of our elected officials.

Constituency: Parent

Other Constituency (if supplied):

User E-mail (if supplied):

This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

From:

Halleran, Michael R <halleran@wm.edu>

Sent:

Friday, January 16, 2015 3:42 PM

To:

College Feedback Halleran, Michael R

Cc: Subject:

comments

Thank you for the opportunity to comment on the proposed college ratings framework being developed by your office.

Let me first say that, like all (or at least I hope all) university leaders, I support transparency and providing useful information to potential students and their families. As you recognize, there is no single set of data that covers all the relevant issues and no single metric that is without problems. Higher education is a complicated beast and what we can most effectively do is make available relevant data and let students interpret them to for their circumstances.

Of the proposed metrics, I would urge in particular that you develop those on loan performance outcomes, graduate school attendance, and the EFC gap. What I urge strongly against is trying in any way to aggregate (and weight) these metrics to some common score. This is the chief limitation of the rankings of USNWR and other such outlets, namely that they arbitrarily assign value to particular data and then by formula compute the findings. Doing this would undermine considerably the value of the data you are providing and, I fear, trivialize your work, making it reducible to a formula-driven number of limited meaning or value. In fact, I would even suggest that it's problematic to refer to these data as "ratings," as rating implies an explicit or implicit value. For example, in the case of post-graduate income, is a higher income a good, bad or indifferent outcome? Too many variable go into these initial salaries that one can't say — without knowing *all* the variables. A school with a high percentage of engineering students will have higher entry-level salaries than one that has large numbers working for NGO's. I would urge that you come up with a different and neutral word/rubric for what you are in fact presenting — that is to say, data. This horse may be too far out the barn door but it would add credibility to your important efforts.

Thank you again for this opportunity and please let me know if I can provide you with any further information.

Sincerely, Michael Halleran

Michael R. Halleran Provost The College of William & Mary Williamsburg, VA 23187 757-221-1993 halleran@wm.edu

From:

WordPress <WEB@ed.gov>

Sent:

Saturday, January 17, 2015 12:39 PM

To:

College Feedback

Subject:

User Comment on New System of College Ratings

User Comment: As a land-grant, public research university, we welcome the opportunity to participate in a fair assessment of, and share data regarding, student success at the University of Connecticut. Having reviewed the tentative framework of the proposed College Ratings System, we have several observations and concerns.

The proposed system seems to be unnecessarily complex, involving multiple layers of reports and data requests with few data elements finalized, and even fewer that are measurable. The plan also fails to address important regional and state differences, regarding demographic data like low-income students and students of color.

If a primary purpose of this ratings plan is to measure the impact and reduce the cost of a college or university education on low-income and first-generation students, we would ask that the most important issues be the ones addressed first: retention and graduation rates for all students and diverse subpopulations. At UConn, we are proud of our 93% first year retention rate for all students and equivalent rate for students of color, as well as our most recent four-, five- and six-year overall graduation rates of 70%, 81% and 81%, respectively. To us, these are critical data points that should be primary in rating all universities and colleges. We also believe the various missions of higher education institutions should be considered more thoughtfully and taken into account in any new ratings system.

Critical questions that need to be asked include: How many low-income and first-generation students are applying to, and being accepted at, graduate school? How are Research I institutions encouraging high potential low-income and first-generation students to pursue Master's Degrees or attend medical and professional schools?

We also do not see the need for an additional tool for evaluative processes that might emerge from this rating plan, when the U.S. Department of Education already has two in existence: the College Scorecard and College Navigator. These existing tools can be used to integrate any new ratings system that is developed. In fact, the College Scorecard system already reports on the most critical aspects of the new rating system, in our opinion, retention and graduation. Finally, many students and their families have difficulty using these tools, so any new tool must be simpler to use, not redundant and not more complex.

Thank you. We hope you find this input useful.

Wayne A. Locust Vice President Enrollment Planning & Management

Sally Reis Vice Provost Academic Affairs

Constituency: University Staff/Faculty

Other Constituency (if supplied):

User E-mail (if supplied): wayne.locust@uconn.edu

This e-mail was sent from a contact form on ED.gov Blog (<u>http://www.ed.gov/blog</u>)

From:

Sent:

Subject:

To:

satisfaction with administration, truth in advertising, etc.) a identical to show how students perceive their institution aft period of time. This survey could be added to the FAFSA reffectiveness can be aggregated and pooled into the database parties.
By using a system of this design, legislators and policy-mainstitution— and the students, parents, other parties will simulating a choice about an institution that does not meet the
Constituency: Student
Other Constituency (if supplied):

User E-mail (if supplied):

College Feedback

WordPress <WEB@ed.gov>

Saturday, January 17, 2015 4:58 PM

User Comment on New System of College Ratings

User Comment: Regarding the ratings system metrics, I would argue the intangible components of student satisfaction need not be correlated to federal funding, but should be included as a part of the overall database. Without this information, the prospective students for any institution will not have a full image of the quality of the institution they are about to attend, especially for schools where the satisfaction of the student body is not going to be clearly broadcast in an unbiased way for the future students to include in their decision-making process.

To illustrate, consider a school where health services has a continually poor track record of treating students in a timely manner. This issue won't be apparent on a financial accessibility level, but this could be a crucial factor for a student with a chronic illness or condition that would require more attention. Alternatively, if student organizations are not given the resources they need to fulfill all campus wants, then the institution is not meeting its end of the bargain in providing a space where students can grow and develop in all of their skills.

Given these examples, and the fact that the idea of the university is increasingly becoming more and more of a costly investment into a business, it is important to protect the consumers (students) and give them the capability to rate their institutions, as well as an open forum for public opinion (that which is often kept hidden by the institutions that they attend).

In simpler terms, the metrics already outlined (using Pell, EFC, etc.) are all useful and should be the primary tools used by legislators since these are all quantifiable values that can drive meaningful policy; however, in addition to the quantified metrics, a section for each institution's ratings should also include the qualified metrics acquired from a student survey (overall student satisfaction, quality of specific campus services, and present these on a 1-5 scale or something er having already attended the institution for any enewal form so that annual updates on institutional ses used for students, parents, and all other interested

kers will be able to measure the success of an multaneously be better protected as consumers from ir needs.

•		
This e-mail was sent from a contact form on	ED.gov Blog (http://www.ed.gov/blog	<u>g</u>)

From: WordPress <WEB@ed.gov>

Sent: Sunday, January 18, 2015 9:34 PM

To: College Feedback

Subject: User Comment on New System of College Ratings

User Comment: Hi, thanks for making the feedback section available.

Pell grants are a bad idea and do not promote affordability. What needs to happen is for tuition to drop. If we remove Pell grants and loans then and only then will Tuition drop.

Constituency: Student

Other Constituency (if supplied):

User E-mail (if supplied): (b)(6)

This e-mail was sent from a contact form on ED.gov Blog (http://www.ed.gov/blog)

From:

Andrew Morse <amorse@naspa.org>

Sent:

Tuesday, January 20, 2015 9:09 AM

To:

College Feedback

Subject:

College Ratings System Suggestion

Dear Department of Education Colleagues,

I write with two quick suggestions for consideration, which are mainly derived from public comment that the rating's plan's use as a public information tool will be limited among low-income students who may be unable to choose the institution to which they can attend. And other research has shown that a lack of information provided to college-aspiring students has negative consequences on college attendance and success. My suggestions are for the ratings system to:

- Include a search filter by institutional type and number of miles from a student's zip code. This will enable students to learn about institutions in relatively close geographic proximity that other sources (i.e. high school guidance counselors, parents, etc.) would not provide otherwise.
- Include a designation on the institution's page that indicates whether online programs are offered.

Thank you for your time and consideration – and best wishes on rolling out this helpful, much needed, and groundbreaking tool.

Best,



Andrew Q. Morse, Ph.D. Director for Policy Research and Advocacy Research and Policy Institute

NASPA - Student Affairs Administrators in Higher Education
111 K Street, NE | 10th Floor
Washington, DC 20002
Phone (202) 719-1197 | Fax (202) 898-5737 | (Cell) (b)(6)
amorse@naspa.org | www.naspa.org | Facebook | Twitter | YouTube

From:

mark@inside-higher-ed.com

Sent:

Wednesday, January 21, 2015 7:33 PM

To:

College Feedback

Subject:

Comment on New System of College Ratings

Attachments:

Comments on Federal Rating Rules (Autosaved).docx

I have attached my comments on the new college rating program.

If you don't accept attachments, please let me know and I will send them as e-mail text.

Thank you.

Mark Feldman www.inside-higher-ed.com

Comments on Federal Rating Rules

As a former math professor, I have seen universities treat students as naïve "consumers", letting "consumer wants" trump "student needs". I have seen universities use DOE grants to increase their revenues and prestige, while satisfying the grant proposal by merely stamping certifications (like PhD) on people. I have seen faux-PhD's become "professors". This system robs future high school teachers of a good education; and, thus, robs *their* students of a good education.

My comments are based on over two decades of such experiences; my focus will be on how colleges will behave in the new environment.

To explain how many colleges run now, I will cite examples of their behavior in the present environment.

First, here are examples from a *US News* top ranked university. I follow these with examples from a regional state university. Note that the regional examples are mainly the *result of behaviors by some highly ranked colleges*. (All examples are on my non-commercial blog www.inside-higher-ed.com, most documented.)

- The math department received a "national need" grant to produce American doctorates. One student, who received her Ph.D. from the professor with the grant, asked me questions one about a common calculus problem that made it clear that she did not even understand math at the M.S. level. I doubt that she was unique. Her case will help in understanding what I have seen at the regional college.
- The university boasts about a professor bringing "a new teaching method" to "advanced" physics which encouraged students to stay in STEM. They "clamor[ed] to get into his classes".
 What he really did was make the course outstandingly easy, giving almost 90% A's. with little work required.
- When I taught a critical math course for engineers:

I utilized MIT's free online course materials, and administrators tried to stop me, even asking me to make the class the normal "cookbook" course, and telling me to teach students only the steps to work problems like those that will be on the test. (The Math Chair told me to do this so that he wouldn't have "problems".)

An Engineering Assoc. Dean (and Dean of *Student Academic Integrity*) was concerned about students doing poorly on an exam. I wrote him that almost all of the ones who had done poorly had cheated on the homework. He wrote back: don't "discourage" them, "retention" is important.

Though the Math Chair kept refusing to show me the "complaints" he was "dealing with", I finally managed to get a copy of them. (He thought I would understand his plight and "release" him from my contract.)

Here is what I saw.

An Engineering student tutor "complained" that he "...cannot do...most [MIT] problems ...and [he] received an A [in the standard "cookbook" version of the course]..."

An outraged father wrote the Deans that his "understanding" was that the average on a test was 47, and that I didn't even curve! (It was actually 67 – several points lower than the other three tests. (I don't curve. I give improving students unspecified "consideration". That works pedagogically.) The Deans responded to the parent by asking for his son to report on whether I had "improved". The student's "report" made it clear that he did not even recognize that homework problems were on the test – some word for word.

The Chair of the Math Department told me that Math had just "wrested" a course from Engineering, and they weren't going to let Engineering "wrest" this course from Math. Clearly, there was a competition to see who could meet the "wants" of a few students to the detriment of all students. The course was worth a lot to the winner's budget. (A Dean had told a previous Chair that he wanted "no complaints", even if that meant a reduction in standards. That is apparently how the winner is determined.)

That's the "elite" school.

I believe much of what I saw at a regional state school (where I taught for a few years) started with a laudable effort in the 60's and 70's to make higher education more accessible. But it mainly made "degrees" more accessible, not education.

I saw the following, and more, almost all from people with PhD's from the 60's and 70's.

- A professor who taught an intro course admitted that, after five years, she could always tell
 when the homework was wrong, but still couldn't always tell what was wrong.
- A professor who taught statistics mistook the most important theorem in statistics as something else, which is a triviality.
- Another professor couldn't understand summation notation or function notation.

These cases are reminiscent of the new PhD whose "degree" was supported in part by national need grant

How will the new ratings system work in this setting – especially with respect to: "strong student outcomes", "informed students and families", and "effective use of federal money"?

I am in favor of the new ratings system. I especially like the way transfers will be handled. But, in the light of what I just described, I worry that colleges will still find ways to market, as they do now, a false reality. Here are a few of the ways that I think they may do that.

They could get a higher rating without improving education by:

- Accepting their own students into their own graduate school.
- Hiring their own grads.
- "Dumbing down" their engineering in order to "work with" other schools as some now do with in their 3-2 engineering program.

Here is one metric that I would add.

• Use the new Teacher Preparedness data to determine (from high school teacher data) what colleges are teaching content well. Without content, high school teachers cannot teach well.

I am also worried about courses in history, government, etc... These courses are critical for good citizenship. It is hard for many students to see their necessity. In this case most "want" something different from what they "need". The only way I can see of keeping colleges from watering down these courses is for the government to find a way to require them at the appropriate level.

From:

Margard, Katherine <margard.1@osu.edu> on behalf of Steinmetz, Joseph

<steinmetz.53@osu.edu>

Sent:

Thursday, January 22, 2015 9:59 AM

To:

College Feedback

Subject:

Comment on the New System of College Ratings

Attachments:

DoE Invitation to Comment on Ratings - Ohio State University Response.pdf

Dear Secretary Duncan:

Attached is The Ohio State University's response to your Invitation to Comment on the "New System of College Ratings." We appreciate the opportunity to provide feedback and hope that you find our comments and suggestions helpful.

Sincerely,

Joseph E. Steinmetz, PhD
Executive Vice President and Provost
The Ohio State University
Steinmetz.53@osu.edu
614-292-4211



THE OHIO STATE UNIVERSITY





203 Bricker Hall 190 North Oval Mall Columbus, OH 43210

614-292-5881 Phone

The Ohio State University Response to the Department of Education's New System of College Ratings – Invitation to Comment

The Ohio State University applauds the President's goal of increased degree and credential completion. Over the past decade, OSU's four year graduation rate has improved by nearly 20%, with 59% now graduating in four years, and 84% graduating in six. At the same time, we have increased undergraduate enrollment 37,509 to 44,741 – an increase of over 19%. OSU has developed a number of successful programs to achieve this. For example our Young Scholars program has attracted and supported first generation high school students from Ohio's largest cities, resulting in higher success rates than expected from urban areas. Programs through our Todd Anthony Bell Center of the African American Male have improved the graduation rates of African American males by 21.5% over the last decade. OSU was pleased to be represented at the National Center for Education Statistics technical symposium on ratings measures and systems, and we are happy to have this additional opportunity to share our expertise. Our comments below follow the structure of the Department of Education's document, "A New System of College Ratings – Invitation to Comment," specifically addressing the questions raised in the invitation. Data used in illustrative examples are from the National Center for Education Statistics' Integrated Postsecondary Education Data System, and are the most current available, 2012-13.

A. How the System Will Rate Institutions

Rating Categories: We support the Department of Education's plan to create ratings rather than a ranking, and agree that using the three levels of high, middle, and low performance based on a small number of categories is better than a more complex approach that might wrongly suggest a high level of precision.

Improvement over time: The Department of Education noted that it is specifically interested in comments on the following questions:

- Which metrics should the Department look at to identify institutional trends over time?
- Over how many years should the Department look to identify institutional trends over time?

The Department should use the same metrics for improvement over time as for the ratings system, which will measure access, affordability, and outcomes. Our suggestions for the metrics are discussed below. The Department should use five years of data to identify trends. Fewer than five make it difficult to identify trends, but additional years are not relevant to students beginning college today. Data available to the Department for metrics will be one to two years behind the release year, which should be made clear in all reports.

Institutions that will be included in the ratings system: We share the Department's concerns on data limitations for non-degree institutions and believe that providing information collected following Gainful Employment regulations is a good interim solution. These data should be available through the same website as the ratings for degree institutions. We believe it is important for the Department to work toward the more rigorous evaluation of these institutions as discussed in the *Invitation*; while the Department notes that non-degree granting institutions represent only about 5% of undergraduate enrollment, that would be nearly a million students.

Institutional Groupings: The Department's discussion of institutional groupings discusses only the presentation of results, and not groupings in order to construct ratings based on comparisons to similar institutions. We understand from this that the definitions of high, middle, and low performance will be the same across all sectors and types of institutions. This is reasonable for all of the metrics discussed later in the *Invitation* except for graduate earnings, since earnings are at least as much a product of the field of study as of the institution, and, especially for part-time students, may also be greatly influenced by previous or concurrent work experience. We strongly encourage the Department not to include graduate earnings in the ratings at all, but if they must be included then the ratings must account for differences in degree and program mix, as well as proportion of part-time students.

With regard to grouping institutions for presentation purposes, we recommend the Department provide for groupings at three levels. The basic level for grouping should be as described in the *Invitation*, with two-year, four-year, and non-degree granting institutions grouped separately. A more advanced level, perhaps of most use to policy makers, could provide users groups based on the characteristics available to select comparison institutions through IPEDS, e.g. state, sector, Carnegie Classification, or institutional size. The third level would be a custom grouping of user-selected institutions. This would be helpful to prospective students as they weigh their options, and to institutions comparing their performance to that of the institutions they consider to be their peers.

B. Data

Ohio State supports the Department's efforts to provide a simple process for institutions to review their reported data and to provide alternative sources of data to supplement their data in the ratings system. The Department should call attention to any metrics for which the data sources are not standard across all institutions, and should determine whether the use of alternative sources of data results in any clear pattern of either better or worse ratings for provider institutions.

We very much support and applaud the Department's plan to release the data used to construct the ratings. Because few data collections are perfect from inception, we recommend that the Department create an on-line forum for discussion of data issues and convene a technical review panel to evaluate the collection and make recommendations for any revisions.

C. Metrics

Access Metrics - Percent Pell, EFC Gap, Family Income Quintiles, First-Generation College Status: The Department should look at percentage and number of students receiving Pell grants. Large public universities serve a range of constituents, and their enrollment of a high percentage of students who do not qualify for Pell grants should not diminish the fact that they enroll a large number who do. Among the 107 universities with 25% or fewer undergraduates receiving Pell Grants in 2012-13, 22 are institutions for which that small percentage represented over 5000 Pell recipients each, for a total of 141,485 Pell recipients – 6% of all Pell Grant recipients at the 671 four year public universities reporting that information to the Department.

If the cut-off for low performance with regard to the percentage of students receiving Pell grants were set at 15% rather than 25%, then only 14 institutions would be included in that category. However, those 14

would include the University of Wisconsin-Madison, which enrolled 4,547 Pell recipients. The argument could certainly be made that UW Madison is doing as much to promote access as, for example, Northwest Indian College, where 83% of students are Pell Grant recipients, for a total of 577 recipients.

Each of the metrics related to access is problematic either with regard to how well it represents the entire student body of an institution or the unintended consequences that may arise from inclusion. We suspect that the metrics are highly correlated; the Department should consider combining these metrics to create a single access metric. A combined access metric would reduce the impact of any single measure and help to alleviate the undesirable incentives described in the *Invitation*. While this would create a much more complex metric, we are not as concerned as the Department about the complexity, which we believe can be handled through good data visualizations. Consumer Reports ratings provide examples of data visualizations that make complex information easy to comprehend.

Affordability Metrics – Average Net Price, Net Price by Quintile: We support the use of Net Price by Quintile as a measure of affordability. Although it does have some of the same limitations as Average Net Price, it provides much better information and allows for a more meaningful rating. For example, the average net price at the University of North Texas ranks 226th lowest among the 644 four year public universities providing net price information, which would surely be categorized as "falling in the middle." However, UNT ranks 11th lowest for students in the \$0-30K income category and 17th for students in the \$30K-\$48K income category, which should be recognized as outstanding with regard to affordability.

Outcomes Metrics – Average Loan Debt, Completion Rates, Transfer rates, Labor Market Success, Graduate School Attendance, Loan Performance Outcomes

We support the Department's decision not to include average loan debt as a metric at this time, for all of the reasons set forth in the Invitation.

Ohio State agrees that it is important to measure graduation rates for transfer students in addition to the traditional fall first-time full-time cohort and supports the use of the new IPEDS information once it is available in 2017. While use of the NSLDS data as a stop-gap measure, assuming the Department's analysis finds a high degree of accuracy in representing completions for all students, and not just those receiving federal financial aid, would allow for such a measure to be implemented more quickly, we do not support the use of those data in this way. The Department should use the IPEDS data for first-time, full-time student graduation rates upon commencement of the ratings, and add graduation rates for part-time and transfer students beginning in 2017. Even if the NSLDS has been highly accurate, using it from commencement of the ratings through 2017 and then moving to IPEDS will result in some shift in the ratings. It will be much easier to explain that part-time and transfer students have been added than to explain why using a different source has resulted in different ratings. 2017 is not far enough in the future to call for an interim solution.

With regard to transfer rates, the Department has specifically asked the following questions:

 Should institutions receive credit for lateral transfers (i.e., from a two-year institution to another two-year institution) if the student goes on to graduate, if the student fails to later earn a degree, in both cases, or in neither case?



- Should institutions receive credit for transfers between four-year institutions? Would we say that
 preparation for transfer is a fundamental mission of four-year institutions and as such, we should
 treat lateral transfers as a positive outcome?
- Should the originating institution get credit for subsequent completions of transfer students (e.g., if a student transfers from a two-year to a four-year school, should the two-year get credit both for the transfer itself and also if the student were to complete their degree at the four-year)? Or should the two-year school only receive credit if the student ultimately completes a degree?

It may be easier to arrive at a metric, however, if instead of thinking about which institutions should "receive credit," we think about what the job of the institution is with regard to graduating students. At Ohio State, we believe it is our job to admit students who can be successful and then to help them attain a degree. Together with the student, we may at some point discover that OSU is not the place where they can be most successful. But if we are doing our job, we discover that at a point where they can move from here and be successful at another four-year institution. Students from Ohio State have transferred to and completed their baccalaureate degrees at such places as Yale, Johns Hopkins, Northwestern, Michigan, Georgia Tech, and Yale. It doesn't matter that preparation for transfer is not a fundamental mission of our institution — we played a role in the success of those students, and it is inconceivable that their transfer would be counted against us.

The job of the two-year institutions may be either to help their students attain a two-year degree or to prepare them to transfer to a four-year institution. For these schools, we contend that attainment of a two-year degree at the school at which the student started or any other two-year school should count as success. In addition, transfer to a four-year institution, regardless of whether the student graduates from that four-year school, should be counted as a success.

We suggest that the rating be based on graduation and transfer rates as follows:

Four-year institutions: Percent of first-time and transfer full-time students who graduate within six years, and of first-time and transfer part-time students who graduate within ten years, from any four year-institution.

Two-year institutions: Percent of first-time and transfer full-time students who graduate from any two-year institution or transfer to a four-year institution within three years, and of first-time and transfer part-time students who graduate from any two-year institution or transfer to a four-year institution within five years.

A calculation of these percentages should be sufficient to sort institutions into low performing, middle, and high performing categories. We suggest, however, that the data for each institution be provided in more detail. The *Student Achievement Measure* provides an excellent model for reporting student outcomes, with student outcomes reported in five categories: 1) Graduated: Reporting institution; 2) Transferred & Graduated: Other institution; 3) Enrolled: Reporting institution; 4) Transferred & Enrolled: Other Institution; 5) Current Status Unknown. While not necessary for the rating, the additional information adds important information for students.

While we find the Department's desire to "provide information about earnings in a way that gives a useful level of information for comparative purposes" laudable, we do not believe there is a way to incorporate

this in ratings that would be of any use to prospective students or to institutions. We find all of the critical comments shared by the Department to be persuasive, in particular the argument that earnings vary much more by degree program than by institution, and we urge the Department not to rate schools based on graduate earnings. We would also point out that part-time students may be working while attending college, and there is no way to know the degree to which earnings represent work experience vs the college attended. We do not agree with the Department's proposal to use the percent of former students earning above 200 percent of the federal poverty line for a family of one. Such a metric will disproportionately disadvantage schools that serve regions in low-cost areas. CNN Money's cost of living calculator shows that a salary of \$20,000 in Columbus, Ohio, which is well below 200 percent federal poverty line, is equivalent to over \$49,000 in Manhattan. Thus, for example, a graduate of Columbus State Community College making \$20K and of the Borough of Manhattan Community College making \$49K could have equivalent buying power in their cities, but Columbus State would rank as low-performing on the metric while Manhattan would not.

Including Graduate School Attendance as a metric would only make sense if you could measure graduate or professional school attendees as a percent of baccalaureate graduates who wished to go on to graduate school. The Department is right to acknowledge that using the limited NSLDS data could be highly problematic.

In measuring Loan Performance Outcomes, the Department should consider using the thresholds established by accreditors with regard to student loan default rates. The Higher Learning Commission requiring reviews when three-year student loan default rates are at 30% or more for 2-year institutions or 25% or more for other institutions; this could be equivalent to a rating of low-performing.

How It Fits Together: Key Questions from the Department are listed below in bold, with Ohio State's responses following.

Would consumers find it easier to see only a single rating for an institution, even if it meant less
clarity about the varying levels of performance across metrics that may feed into the rating? To what
extent could this be mitigated by providing both an overall rating and disaggregated metric
information?

Some consumers would find it easier to see only a single rating. But in fact, consumers value different variables differently. Given that schools will be given one of three ratings for each metric, it should be fairly simple to provide a visualization that disaggregates the information. Consumer Reports has been providing ratings based on multiple factors for its subscribers for years and might provide a good model.

 A primary purpose of the ratings is to hold institutions accountable by measuring and publishing performance information. Would individual ratings on each metric or an overall rating make it easier to assess performance across the dimensions of the ratings system or would it hide or otherwise distort an institution's performance?

Institutions are already held accountable by their accrediting bodies, and accreditors should be confronted if they are not doing their job. The Department of Education would do a greater service by focusing on providing consumer information through the ratings.

 Might it be useful to combine some related metrics (but not all of them) to allow for more a more meaningful representation of performance than possible on a single dimension in isolation? (For example, would it be helpful to merge into one element an outcome like completion rate, and the price students pay to attend the school?)

It would be useful to merge metrics that measure the same thing, such as multiple metrics that measure access. Metrics that measure different but related performance should be reported separately. Depending on how the metrics were weighted, we can immediately see that an expensive school (low-performing) with a high completion rate (high-performing) might be represented as performing equally well as a school that is inexpensive (high-performing) with a low completion rate (low-performing).

 What metrics based on combinations of the data described above would be most useful to guide consumer choice, and for institutional accountability?

We recommend providing a combined metric that addresses access; average net price by quintile; and graduation and transfer rates as described above. Additional data, not to be summarized as metrics, on graduate earnings could be helpful. Professor Joshua Hawley of Ohio State's Center for Human Resource Research has created an interface on graduate earnings by program that could serve as a useful model. Providing this information publicly supports institutional accountability, which is also assured through the accrediting associations.

D. Adjusting Outcomes for Student and Institutional Characteristics

Student Characteristics: The Department requests comments on the following:

- In terms of the student-level data available to the Department, which student characteristics are the
 most important to include in a regression model to avoid harmful consequences for disadvantaged
 students and institutions that serve them?
- Which student characteristics are likely to be most influential on outcomes?
- Which student characteristics are likely to vary the most between institutions within the same
 institutional groupings? What kinds of student characteristics are unlikely to be adequately captured by
 institutional groups based on institutional characteristics such as predominant degree award level?
- Are some student characteristics more important to include for some outcomes metrics and some more important to include for others? Which student characteristics are important for all of the outcomes metrics we are considering, rather than just particular metrics?
- Given the limitations of the data we have, how should we assess the validity and reliability of the regression-adjusted outcome measures we are developing?

Unfortunately, the student characteristics necessary to avoid harmful consequences aren't available. According to the report A New System of College Ratings—Invitation to Comment,

"...we have comprehensive individual-level administrative data on the income of students and their families, but we lack individual-level data on academic preparation (e.g., high school GPA or SAT/ACT scores). This means that we can take into account the socio-economic background of students who receive federal student aid within each college, but we cannot directly measure the academic preparation of individual students. We acknowledge that data limitations will impede our ability to

fully take into account the characteristics of the students served by institutions, but the data we have will nonetheless enable us to provide a more fair assessment of institutional performance to the public than one that relies solely on raw outcome data".

However, while controlling for socio-economic and demographic variables is necessary condition for unbiased estimates, it is not sufficient. Any regression adjustment assessing the influence of institutions without also controlling for additional variables is likely to produce biased estimates of outcomes (e. g. graduation). While non-cognitive variables (e.g. perseverance, self-efficacy, ability to delay gratification, conscientiousness) should also be included, at the very least, some metric of academic ability is crucial as these are likely to be the most important variables that vary between institutions. For example, an institution that admits a sizeable proportion of students with academic challenges will very likely have a lower graduation rate relative to an institution of equal quality that admits fewer of these students. Thus, to the extent that graduation rate is a component of the rating system, controlling only for variables socio-economic and demographic variables such as first generation status, EFC, the proportion of Pell recipients, etc. without also controlling for academic ability will very likely negatively bias the rating of the institution with the larger proportion of academically challenged students. Only after the influences of academic variables have been removed can a more fair assessment of institutional influence on completion rate be made. Thus, it is likely not true that "the data we have will nonetheless enable us to provide a more fair assessment of institutional performance".

The validity and reliability of a regression model will fundamentally depend on its correct specification. This means that if important variables are omitted and/or its functional form (for parametric models) is incorrect, the model will likely have low reliability and predictive validity. Models with omitted variables will always produce biased parameter estimates. At the very least the residuals of a regression model should be examined. This involves assessing the relationship of the residuals with the covariates in the model. For each variable included in the model, a plot of the residuals against the variable should show random behavior with a mean of zero for the entire range of the covariate. Non-zero relationships or relationships with curvatures with respect to variables included in the model could indicate that the functional form needs to be re-specified. Non-zero relationships with variables not included in the model indicate that the variable should be included for correct specification. Another common test is the lack-of-fit test that assesses whether the regression model is a good fit to the data. This test assesses the degree to which the mean, conditional on some level of a covariate, differs from the regression model fitted value at that level. If this lack-of-fit error is a significant proportion of the total error at some specified criterion, then the model does not fit the data and needs to be re-specified. These are common methods of assessment that any analyst would do in the course of building the model.

Institutional Characteristics:

Issues related to program mix and earnings are best dealt with by not including earnings as a metric, but by providing data about earnings by major by institution. While this may not be possible for the Department, such information is becoming more available at the state and multi-state level. The Department should consider providing links to such data as it becomes available.

E. College Ratings Website and Transparency Tools

Existing models of consumer-friendly ratings tools: Key Questions from the Department are listed below in bold, with Ohio State's responses following.

Are there examples of online tools that are particularly helpful for students and the public? What
characteristics of these tools make them useful? How could the Department integrate similar tools
and design features into the ratings website to make the information accessible?

The most important feature is that everything is designed for optimal access on a mobile device.

 The Department publishes numerous existing tools already including the College Scorecard and College Navigator. Should the ratings system be incorporated into one of these existing tools or should the Department develop a new tool specific to the ratings? How should the Department publicize these tools to ensure that consumers are aware of them and their benefits?

Yes, the ratings system should either be incorporated into or replace the College Scorecard so that there are not two competing Department of Education products that provide very similar information. The Department should have conversations with high school counselors through their associations and with college admissions officers to determine the best ways to promote the system to prospective college students.

Is there specific research that would inform the effort to make our website and tools as user-friendly as possible?

A cursory search of "user-friendly interface rules/guidelines" will reveal a wealth of data on website design and developing a user-friendly interface.

The below text is credited to: http://www.usability.gov/what-and-why/user-interface-design.html

Basic rules/guidelines for developing a user-friendly interface are:

- **Keep the interface simple.** The best interfaces are almost invisible to the user. They avoid unnecessary elements and are clear in the language they use on labels and in messaging.
- Create consistency and use common UI elements. By using common elements in your UI, users feel more comfortable and are able to get things done more quickly. It is also important to create patterns in language, layout and design throughout the site to help facilitate efficiency. Once a user learns how to do something, they should be able to transfer that skill to other parts of the site.
- Be purposeful in page layout. Consider the spatial relationships between items on the page and structure the page based on importance. Careful placement of items can help draw attention to the most important pieces of information and can aid scanning and readability.
- **Strategically use color and texture.** You can direct attention toward or redirect attention away from items using color, light, contrast, and texture to your advantage.
- Use typography to create hierarchy and clarity. Carefully consider how you use typeface. Different sizes, fonts, and arrangement of the text to help increase scanability, legibility and readability.
- Make sure that the system communicates what's happening. Always inform your users of location, actions, changes in state, or errors. The use of various UI elements to communicate status and, if necessary, next steps can reduce frustration for your user.

• Think about the defaults. By carefully thinking about and anticipating the goals people bring to your site, you can create defaults that reduce the burden on the user. This becomes particularly important when it comes to form design where you might have an opportunity to have some fields pre-chosen or filled out.

Other helpful sites/links are:

- http://theomandel.com/wp-content/uploads/2012/07/Mandel-GoldenRules.pdf
- http://useriab.com/Downloads/Smith Mosler guideline .pdf
- http://www.computerweekly.com/feature/The-secret-to-designing-user-friendly-interfaces-for-desktop-software
- https://www.udemy.com/blog/dashboard-design/
- Are there examples from other fields that accomplish similar goals and could be good models for college ratings (e.g., energy efficiency "star" ratings, health provider ratings, nutrition labeling, etc.)?

Consumer Reports provides easy to understand ratings of everything from phones to cars to grocery stores. These are all entities for which individual consumers value various features differently, as they do for higher education.

How should the Department educate consumers on the use and meaning of the ratings?

They need to be simple enough to understand that the majority of users will not need to be educated to use them. Consumer Reports is very intuitive, and this rating needs to be as well. For those who want more information, providing information on the website, perhaps including a YouTube video would be helpful.

What kind of outreach campaign would be most effective in promoting the ratings?

We recommend the following campaign elements to promote the ratings:

- Partner with higher-education professional organizations to garner third-party endorsements. Examples of partner organizations:
 - NACAC National Association for College Admissions Counseling
 - AACRAO American Association of Collegiate Registrars Officers
 - NASFA National Association of Student Financial Aid Administrators
 - AIR Association for Institutional Researchers
- Develop a media relations initiative to garner third-party editorial in industry and consumer media relevant to higher education audiences, including
 - Develop a media kit to include information of the ratings system, press releases, FAQ information, storyline ideas, contact information, promotional videos, interviews/speeches or other media covered event, etc. Media kit should be distributed to industry and consumer media relevant to higher education audiences
 - Pitch stories and content directly to editors of relevant print, radio, broadcast and Internet media
- Develop a comprehensive website with all necessary/pertinent content



- Promote website in all marketing/communication material
- Partner with industry organizations to place links on their sites
- Prominently display website on Ed.gov site
- Maximize online marketing opportunities, including:
 - Search engine optimization
 - Social media
 - Digital display advertising
 - Keyword advertising on search engines

Consumer Customization: Key Questions from the Department are listed below in bold, with Ohio State's responses following.

Are there additional helpful categories by which to compare institutions? For example, would
consumers want to be able to rate institutions by sector (e.g., public versus private), by location
(e.g., within a specific state), etc.?

Consumers should be able to compare institutions by sector, state, highest degree offered, size category, Carnegie Classification, and selectivity.

If the example question was intended to mean, "Would consumers want to be able to compare institutions' ratings by sector", then the listing above is sufficient. However, the example question seems to indicate that an institution's rating could depend upon the group within which it is being rated. That might have some benefits – it could certainly be the case that a school that is rated as having a mid-level performance on outcomes within the full set of rated institutions could be high performing relative to other schools in the same state. We would discourage the Department from customizing the ratings by categories, however. Every school will figure out within which category they have the best rating and publicize that rating, which will be confusing for consumers.

Would consumers find it helpful to be able to select custom weighting for metrics? (That is, if the
Department decides to roll-up the metrics into an overall rating, we may decide that one metric is
more important than another one and weight it more heavily in determining an institution's rating
but a consumer may want to apply equal weighting or even zero weighting to a metric.)

While it could make sense to roll up metrics related to access into a single metric, affordability into a single metric, and outcomes into a single metric, rolling up all the metrics into an overall rating does not provide useful information. Nor is a single metric necessary to reduce complexity, given that the plan is to have only three ratings for each metric. While different weightings by category would of course affect the overall rating, the chart example below demonstrates that an overall rating would add little information if the category ratings are provided in a simple, easy to understand format.



	School 1	School 2	School 3	School 4	School 5	School 6	School 7
Access	•	♦	♦	*	*	•	*
Average Net Price by Quintile	*	•	♦	*	*	•	*
Graduation & Transfer Rates	♦	♦	•	•	*	*	*
Overall	*	*	*	*	*	*	*

- ❖ = midlevel performance
- ♦ = high performance
- ◆ -low performance
- Would consumers want to be able to see data on a measure disaggregated by a specific subgroup of students (e.g., Pell versus non-Pell recipients)? If so, what subgroups are helpful to include?

Almost any data the Department might suggest will be important to someone. We urge the Department to focus on producing the ratings at this time, and evaluating the most helpful additional data reports following the initial release. As the Department has multiple venues for relevant data (IPEDS, College Scorecard, College Navigator), it should develop a comprehensive plan to structure its information to reduce redundancy and clarify the unique purpose of its various sites.

How else might the customization tool be helpful?

This may be easier to answer once the rating system is more fully developed. A technical review panel should be convened, with Department staff demonstrating a prototype and reviewers allowed time to interact with the system and then provide feedback.

Additional information provided by institutions: The Department notes that some commenters have suggested that colleges should have an opportunity to add further information and links to their resources to provide a more complete institutional picture. Ohio State agrees with this suggestion; both the VSA College Portrait and the Student Achievement Measure are excellent models for such a provision. Standard categories are helpful for students who wish to compare two or more schools; the standard categories used by the VSA College Portrait would be a good starting point for consideration by the Department.